

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

**MASTER SHORT FORM COMPLAINT  
FOR DAMAGES FOR INDIVIDUAL  
CLAIMS**

Plaintiff(s) named below, for their Complaint against Defendants named below, incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc. 364).

Plaintiff(s) further show the Court as follows:

1. Plaintiff/Deceased Party:

Carolyn Bland

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of consortium claim:

n/a

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):

n/a

4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of implant:

Florida

5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of injury:

Texas

6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

Texas

7. District Court and Division in which venue would be proper absent direct filing:

United States District Court for the Northern District of Texas

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8. Defendants (check Defendants against whom Complaint is made)::

C.R. Bard Inc.  
 Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction:

Diversity of Citizenship  
 Other: \_\_\_\_\_

a. Other allegations of jurisdiction and venue not expressed in Master  
Complaint:

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10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a  
claim (Check applicable Inferior Vena Cava Filter(s)):

Recovery® Vena Cava Filter  
 G2® Vena Cava Filter  
 G2® Express (G2®X) Vena Cava Filter  
 Eclipse® Vena Cava Filter  
 Meridian® Vena Cava Filter  
 Denali® Vena Cava Filter  
 Other: \_\_\_\_\_

11. Date of Implantation as to each product:

2/8/2010

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12. Counts in the Master Complaint brought by Plaintiff(s):

- Count I: Strict Products Liability – Manufacturing Defect
- Count II: Strict Products Liability – Information Defect (Failure to Warn)
- Count III: Strict Products Liability – Design Defect
- Count IV: Negligence - Design
- Count V: Negligence - Manufacture
- Count VI: Negligence – Failure to Recall/Retrofit
- Count VII: Negligence – Failure to Warn
- Count VIII: Negligent Misrepresentation
- Count IX: Negligence *Per Se*
- Count X: Breach of Express Warranty
- Count XI: Breach of Implied Warranty
- Count XII: Fraudulent Misrepresentation
- Count XIII: Fraudulent Concealment
- Count XIV: Violations of Applicable TX, FL Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade Practices
- Count XV: Loss of Consortium
- Count XVI: Wrongful Death
- Count XVII: Survival

Punitive Damages

13.  Other: \_\_\_\_\_ (please state the facts supporting this  
Count in the space immediately below)

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RESPECTFULLY SUBMITTED this 3 day of February, 2020.

**BERNSTEIN LIEBHARD LLP**

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*Attorneys for Plaintiff*

I hereby certify that on this 3 day of February, 2020, I electronically  
transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and  
transmittal of a Notice of Electronic Filing.

/s/Daniel Burke